

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO POSTCOM INTERROGATORY 8
(April 3, 2000)

The United States Postal Service hereby files this objection to the following interrogatory directed by PostCom on March 23, 2000. POSTCOM/USPS-8, filed on March 23, 2000.

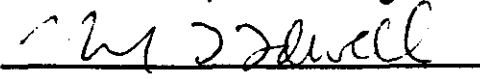
Generally, this interrogatory asks the Postal Service to estimate the additional costs caused by address deficiencies. The Postal Service objects because responding to the question would impose an undue burden. To isolate and calculate the costs caused by address deficiency in one or more mail classes, the Postal Service would have to execute a cost study of the type and complexity which are developed in support of testimony filed in this proceeding. Such a study would require at least a month to design and test, would involve additional work-weeks of data collection, and at least a month of analysis and review before results could be tabulated and published. Such a task would be further complicated by the requirement, implied by subpart 8(b), that the study produce data by class, subclass, shape, and rate category.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Michael T. Tidwell

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "M. Tidwell", is written over a horizontal line.

Michael T. Tidwell

April 3, 2000